

June 5, 2023

Christopher Pontiff
MVP Health Plan, Inc.
625 State Street
Schenectady, NY 12305

Re: MVP Health Plan, Inc.
2024 Vermont Exchange Rate Filing – Individual
SERFF Tracking #: MVPH-133660955
Objection #3

Dear Mr. Pontiff:

The following additional information is required for this filing.

Notice regarding proper responses:

- A minimum-acceptable response to quantitative questions from us must include a spreadsheet calculation with retained formulas such that we can replicate the calculations therein.
- Explanatory responses are merely a supplement to the spreadsheet material and in of themselves will constitute a lack of response.

Questions:

1. Regarding question #4 in Objection Letter 2: What were the primary driver(s) of the higher Rx trends in 2020-2021 and, separately, 2021-2022?
2. Regarding question #5 in Objection Letter 2: Please elaborate on exactly what corrections need to be made to Exhibit 2a and the URRT. Further, please disclose any impact this has on the proposed rates.
3. Regarding Line 13 in question #12 in Objection Letter 2:
 - a. Why wasn't a utilization reduction assumption applied to treatment and visits due to the removal of waived cost sharing, as was done for testing?
 - b. The table provided, "Adjustments to Make to Experience Period Data due to Vaccines" indicates 165,128 member months. Please also provide the number of distinct members and the number of distinct COVID-19 vaccine utilizing members.
4. Regarding question #14 in Objection Letter 2: Membership shifts for 2020 to 2021 and 2021 to 2022 were provided. Please also provide the membership shift between metal levels for 2022 to 2023, using the current enrollment distribution.

5. Regarding question #18 in Objection Letter 2: Please provide a similar breakdown of the general administrative load for actual 2022 expenses.
6. The Federal Act Memo states that there is a +0.05% allowed claim cost impact for plan design changes related to the impact of hearing aids as EHB. However, the “Plan Design Changes” adjustment factor in the URRT is 1.000. Please confirm that this is due to URRT rounding.
7. Regarding the historical SHCE admin PMPM provided in the Actuarial Memorandum:
 - a. What were the driver(s) of the significant increase in administrative costs PMPM in 2021?
 - b. In the rate-year 2022 filing (filed in 2020), it was stated that in 2022 MVP would take on the billing and payment processing functions, resulting in an increase to the administrative costs PMPM. However, the actual 2022 administrative costs PMPM decreased by approximately \$3 PMPM. Please reconcile.
8. We are aware of an updated actuarial certification from Wakely for the 2024 Standard Plans due to IRS-release final H.S.A. limits for 2024. Please either confirm that the noted revisions are included in the submitted rate filing or list each revision and provide the calculation of the resulting rate impact. If the latter, do not provide fully revised documentation (URRT, Act Memo, Exhibits, etc.) at this time.

To ensure that the review of your filing is completed before statutory deadlines, we expect you to respond as expeditiously as possible, but no later than June 12, 2023.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,



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